

Exhibit D

In the Matter Of:
CITY OF DETROIT, MICHIGAN

Case No. 13-53846

CHARLES M. MOORE

September 18, 2013



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CHARLES M. MOORE
CITY OF DETROIT, MICHIGAN

September 18, 2013

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1 IN THE UNITED STATES BANKRUPTCY COURT
2 EASTERN DISTRICT OF MICHIGAN
3 , SOUTHERN DIVISION

4
5 In re Chapter 9
6 CITY OF DETROIT, MICHIGAN, Case No. 13-53846
7 Debtor. Hon. Steven W. Rhodes

8 /
9
10 DEPONENT: CHARLES M. MOORE
11 DATE: Wednesday, September 18, 2013
12 TIME: 10:02 a.m.
13 LOCATION: MILLER CANFIELD PADDOCK & STONE PLC
14 150 West Jefferson, Suite 2500
15 Detroit, Michigan
16 REPORTER: Jeanette M. Fallon, CRR/RMR/CSR-3267
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1 would be -- that in the City's view must occur;
2 correct?

3 A. Correct.

4 Q. Has there been a specification of those level of cuts
5 that the City contends must occur?

6 MR. MILLER: Object to form.

7 Q. I mean, have you put a dollar amount on it?

8 A. No, and our analysis of this continues. Right now we
9 still don't know what assets could be available to put
0 towards the pensions. We still have not had the type
1 of dialogue that we would like to have related to the
2 calculation of the unfunded amount, so because of
3 those two uncertainties among others we don't know
4 what cuts, if any, there may need to be.

15 o. Well, doesn't it say there must be significant cuts?

16 Am I -- are you saying that there's some -- that the
17 City's position may be that there are no cuts that are
18 necessary in accrued vested pension amounts?

19 MR. MILLER: Object to form.

20 A. We don't know. That's where we want to continue to
21 engage in discussions and negotiations with the
22 parties, but depending on what the unfunded amount is
23 and what assets may be available for those claims, it
24 certainly is possible.

25 O. So maybe that should have been worded there may be



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1 State of Michigan)

2 County of Genesee)

3 Certificate of Notary Public

4 I certify that this transcript is a complete, true and
5 correct record of the testimony of the witness held in this
6 case.

7 I also certify that prior to taking this deposition,
8 the witness was duly sworn or affirmed to tell the truth.

9 I further certify that I am not a relative or an
10 employee of or an attorney for a party; and that I am not
11 financially interested, directly or indirectly, in the
12 matter.

13 WITNESS my hand this 20th day of September,
14 2013.

15
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17 
18 Jeanette M. Fallon, CRR/RMR/CLR/CSR-3267

19 Certified Realtime Reporter

20 Registered Merit Reporter

21 Certified LiveNote Reporter

22 Certified Shorthand Reporter

23 Notary Public, Genesee, Michigan

24 Acting in Oakland County, Michigan

25 My Commission Expires: 9-19-18